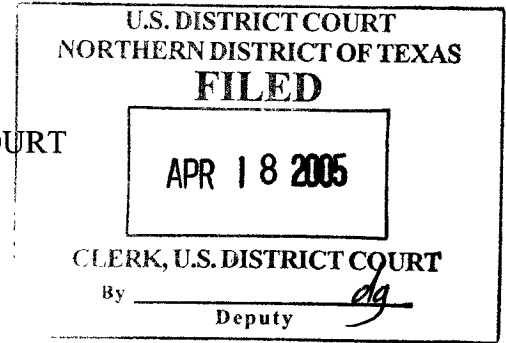


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ORIGINAL

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

BAYAN ELASHI
GHASSAN ELASHI
BASMAN ELASHI
INFOCOM CORPORATION

(1)
(2)
(3)

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Criminal Action No. 3:02-CR-052-L

CONFIDENTIAL JUROR QUESTIONNAIRE

Instructions:

The purpose of this questionnaire is to provide guidance to the lawyers and the judge in deciding whether you should serve as a juror on this particular case. This questionnaire *will not* be made public. Your names will not be used on the public record. Only court personnel and the parties will have access to this document and your identifying information. Please answer the questions as honestly and completely as possible. Remember also that there are no “right” or “wrong” answers; there are only truthful answers. **Do not list your street address or telephone number.**

In order for this process to work, it is important that you are completely candid with the court as to your actual views and opinions. Everyone involved in this process is genuinely interested in what you think, so please be truthful in your answers.

You have been sworn to give truthful answers, and any deliberately false answer to any question could subject you to prosecution for perjury or false statement. Also, it possibly could cause us to retry the case, which would be a tremendous waste of time to the parties, the public, and the court.

It is important that all the answers you provide on this questionnaire are yours and yours alone. Do not discuss the questionnaire or your answers with anyone, including court personnel and, especially, other prospective jurors. If you do not understand a question, just say so on the questionnaire and you will be afforded an opportunity to clarify any confusion at a later time. If a question touches on an especially personal matter, please write "private" in the answer and you will be given the opportunity to discuss that matter in private at a later time. There are extra pages at the back if you need more space to answer a question. If you do that, please put the number of the question you are answering on the extra space.

Criminal No.: 3:02-CR-052-L

CONFIDENTIAL QUESTIONNAIRE
(Make certain that you carefully read the instructions
before answering this questionnaire.)

Name: _____ **Juror ID #** _____

Date & Place of Birth: _____ **County of Residence** _____

1. Where were you born? _____

2. Where were your parents born? Father _____ Mother _____

3. Where in North Texas do you live? (provide city or county only) _____

4. Have you ever lived outside of the United States?
☐ Yes ☐ No If yes, where have you lived and for how long? _____

5. Where do you work (If unemployed or retired, what was your last employment)?

6. How long have you worked at your current place of employment? _____

7. What is your current position or title and what are your job responsibilities?

8. What other jobs have you held in the past? _____

9. Have you ever been responsible for supervising, hiring, or firing employees? ☐ Yes ☐ No

10. Marital Status: _____ If married, for how many years? _____

11. How many times have you been married: ☐ never ☐ 1 time ☐ 2 times ☐ 3 or more

12. How far did you go in school [if college or graduate school, name school(s) and any degree(s) you received]? _____

13. Have you, any family members, or close friends ever worked for any federal, state, or local law enforcement agency? [For example, Dallas Police Department, Department of Public Safety, Federal Bureau of Investigation, Central Intelligence Agency, Drug Enforcement Administration, Internal Revenue Service, Homeland Security, Immigration, Corrections, United States Customs, Secret Service, etc.] ☐ Yes ☐ No
If yes, please state who, what agency, how long and highest rank achieved:

14. Have you, any family members, or close friends ever worked for the United States Government? ☐ Yes ☐ No
If yes, please state who, what agency and the length of time:

15. Have you, any family members, or close friends ever taken any course(s) or seminar(s) in Criminal Law, criminology, Islamic Law, law enforcement, Middle Eastern Studies, religion, or terrorism? ☐ Yes ☐ No
If yes, what course(s) or seminar(s) and where did you take the course or seminar:

16. Do you believe there is a general prejudice against people who are from Palestine?
☐ Yes ☐ No If yes, please tell us why you think this is so: _____

17. Have you, any family members, or close friends ever testified in a criminal or civil case?
☐ Yes ☐ No If yes, please tell us who and why he/she testified: _____

18. Have you ever been questioned in any matter by the United States Department of Justice or any investigative agency of the United States, including the Federal Bureau of Investigation, the Department of Homeland Security, the Secret Service, the Internal Revenue Service, or any other state or federal investigative agency? ☐ Yes ☐ No
If yes, please explain the circumstances of your interrogation: _____

19. Do you personally, or in connection with your business, have any pending interest in any legal action or dispute with the United States, or any officer, agents, or employees of the United States? ☐ Yes ☐ No
If yes, please explain the nature of your interest in such proceedings: _____

20. Do you have an opinion whether people living in America should become involved in political causes affecting foreign countries? ☐ Yes ☐ No Please explain your answer:

21. Have you ever donated money to an organization or cause without personally participating in the activities of that group? ☐ Yes ☐ No
If yes, please tell us what organizations: _____

22. Have you, any family members, or close friends ever traveled to any of the following countries:

☐ Afghanistan ☐ Arab Emirates ☐ Bosnia ☐ Egypt ☐ Herzegovina ☐ Iran
☐ Iraq ☐ Israel ☐ Jordan ☐ Kenya ☐ Kuwait ☐ Lebanon ☐ Libya ☐ Pakistan
☐ Palestine ☐ Saudi Arabia ☐ Serbia ☐ South Africa ☐ Sudan ☐ Syria
☐ Tanzania ☐ Yemen

If you checked any of the boxes above, please tell us:

- a. Who was the traveler(s): _____
b. When was the trip(s) taken: _____
c. What country(ies) was visited: _____
d. What was the purpose of the visit(s): _____

23. What are your feelings or opinions about people from Palestine? _____

24. Have you ever had a bad experience with someone from Palestine? ☐ Yes ☐ No
If yes, please tell us about the experience: _____

25. Have you ever been the object of a racist or ethnically prejudicial comment?
☐ Yes ☐ No If yes, what was your reaction to that situation? _____

26. Do you know anyone who practices the faith of Islam? ☐ Yes ☐ No
If yes, what is your relationship to that person? _____

27. What knowledge do you have about the history and practices of Islam? _____

28. Is there anything about the Islamic teachings or doctrine that is personally offensive to you?
☐ Yes ☐ No If yes, please explain: _____

29. Do you believe that Palestinians have different moral or ethical values than you?
☐ Yes ☐ No If yes, please tell us how they are different: _____

30. Do you believe the religion of Islam endorses violence to a greater or lesser degree than other major religions: ☐ Greater ☐ Lesser Please tell us why you feel this way:

31. Do you socialize with any people of Arab descent? ☐ Yes ☐ No

32. Do you know anyone who, as a member of the military was involved in any Arab or Israeli conflict? ☐ Yes ☐ No If yes, please tell us:
- a. What is your relationship to the person who served? _____
- b. If you know, how were they involved? _____
33. Do you have any family, relative or friends in the military who are currently stationed in the Middle East? ☐ Yes ☐ No If yes, where is that person stationed?
- _____
34. What criminal case(s) have you followed in the media? _____
- _____
35. What is your main source of news:
- ☐ Television ☐ Radio ☐ Newspaper ☐ Family or friends ☐ Internet
36. How closely have you followed the news coverage of the Israeli and Palestinian conflict:
- ☐ Very closely ☐ Somewhat closely ☐ Not too closely ☐ Not at all
37. Would anything about the conflict between the Palestinians and the Israelis affect your ability to be a fair and impartial juror in this case? ☐ Yes ☐ No
- If yes, please explain: _____
- _____
38. In this case, the Government may allege that members of the Elashi family; their company, Infocom Corporation; and the Islamic charity named the Holy Land Foundation have been linked to Hamas, which is a Palestinian organization. What, if anything, do you remember reading about this case, the Elashi brothers, Islamic charities, or the Holy Land Foundation?
- _____
- _____
- _____
39. How many times have you heard or read about this case, the Elashi brothers, Infocom, or the Islamic charity named the Holy Land Foundation?
- ☐ None at all ☐ 1 to 5 times ☐ 5 to 10 times ☐ More than 10 times

40. Based on what you have heard, read, or seen, please tell us what feelings or opinions, if any, you have formed about this case, the Elashi brothers, or the Islamic charity called the Holy Land Foundation? _____

41. If it is not too personal, please tell us what religion you were raised in, if any:

42. Have you ever changed your religion? ☐ Yes ☐ No
If yes, please tell us why you changed your religion: _____

43. How important would you say religion is in your life:
☐ Very important ☐ Important ☐ Somewhat important ☐ Not important at all
44. Do your religious beliefs affect what you do, such as how you vote or who you donate money to? ☐ Yes ☐ No ☐ Somewhat (Explain, if necessary)

45. Have you ever served as a juror in a: ☐ Civil case ____ times ☐ Criminal case ____ times?
a. What type(s) of criminal case(s): _____
b. What was the verdict: _____
c. Were you ever the presiding juror? ☐ Yes ☐ No
46. Was there anything about your prior jury service that would affect your ability to be fair and impartial to Defendants or the Government? ☐ Yes ☐ No
If yes, please explain: _____

47. Have you ever served on a Federal or State Grand Jury? ☐ Yes ☐ No
If Yes, when and where did you serve? _____

48. Other than being called for jury duty in this case, have you ever been to court before?
☐ Yes ☐ No If yes, which court and under what circumstances?

49. Do you believe that noncitizens are entitled to the same rights in a United States court as a United States citizen? ☐ Yes ☐ No If no, please explain: _____

50. Do you believe that merely because a witness is a law enforcement officer, his or her testimony is entitled to special consideration? ☐ Yes ☐ No
51. What languages other than English do you speak or understand? _____

52. How often do you read the following newspapers:
The Dallas Morning News _____ *The New York Times* _____
53. Other than *The Dallas Morning News* or *The New York Times*, what other newspapers, trade journals or magazines do you read on a regular basis? _____

54. What do you enjoy doing in your spare time? _____

55. What local television news do you watch most often? _____

56. What are your favorite television shows? (1) _____
(2) _____ (3) _____
57. Do you listen to talk radio? ☐ Yes ☐ No
If yes, to what programs do you listen? _____
58. Do you consider yourself:
☐ Very Conservative ☐ Conservative ☐ Moderate ☐ Liberal ☐ Very Liberal ?
59. Would you characterize yourself as a: ☐ Leader ☐ Follower ☐ Team Player
(Explain if necessary)

60. To which societies, unions, professional associations, civic clubs, fraternities, sororities, or other organizations do you belong? _____

61. Do you have any medical or physical condition that would make it difficult or impossible for you to serve as a juror in this case? ☐ Yes ☐ No
If yes, please give details or tell us you want to talk about it privately:

62. Is there anything that would interfere with your ability to serve as a juror in this case?
☐ Yes ☐ No If yes, please give details: _____

63. Is there anything else that you believe, insofar as your ability to be fair and impartial, is important for you to tell the judge and the attorneys? If so, please state below:

64. State the name of your spouse and describe your spouse's occupation or employment and job duties. If your spouse is retired or unemployed, state your spouse's principal occupation when employed. _____

65. Have you, a member of your family, or a close friend ever been a defendant in a criminal case? ☐ Yes ☐ No If yes, please provide the details, including the outcome of the proceeding. _____

66. Have you ever received legal training of any kind? Yes ☐ No
If yes, what was the training? _____

67. Have you ever written a letter to the editor? Yes ☐ No
If yes, about what subject? _____

68. Do you or have you displayed a bumper sticker on your car?
Yes ☐ No If yes, what was the message? _____

69. Do you know any of the other prospective jurors in this case? Yes ☐ No
If yes, please list his or her name(s) and in what capacity you know such person(s):

70. Is there anything about being asked to answer the questions contained in this confidential juror information sheet that would affect your ability to be fair and impartial if selected to serve as a juror in this case? If yes, please state below: _____

Extra space to supplement answers:

Extra space (continued):

Declaration

I solemnly swear or affirm, under penalties of perjury, that the answers to the foregoing questions are true and correct.

(signature) **Date:** _____